

JASON M. FRIERSON  
United States Attorney  
Nevada Bar No. 7709  
OSCAR GONZALEZ DE LLANO, DCBN 491042  
Special Assistant United States Attorney  
Office of Program Litigation, Office 7  
Office of the General Counsel  
Social Security Administration  
6401 Security Boulevard  
Baltimore, MD 21235  
Telephone: (510) 970-4818  
Email: oscar.gonzalez@ssa.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

TAMIKO AARON,

Plaintiff,

vs.

LELAND DUDEK,<sup>1</sup>  
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:25-cv-00075-BNW

**UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO FILE RESPONSE TO PLAINTIFF'S  
BRIEF; [PROPOSED] ORDER**

***(FIRST REQUEST)***

---

<sup>1</sup> Leland Dudek became the Acting Commissioner of Social Security on February 16, 2025. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Leland Dudek should be substituted for Michelle King as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 Defendant, Leland Dudek, Acting Commissioner of Social Security (the “Commissioner”), by  
2 and through the undersigned attorneys, hereby moves for a twenty-eight day extension of time to file the  
3 response to Plaintiff’s Brief. The response to Plaintiff’s Brief is currently due to be filed by May 14,  
4 2025. This is the Commissioner’s first request for an extension of time. Plaintiff’s counsel has no  
5 opposition to the requested extension.  
6

7 Defendant makes this request in good faith and for good cause. Defendant anticipates that despite  
8 diligent efforts, he will be unable to complete the Responsive Brief within the current deadline. Counsel  
9 has several competing deadlines and merit briefs currently due in district court cases in the next 7 days.  
10 The undersigned Counsel apologizes to the Court and Plaintiff’s counsel for any inconvenience caused  
11 by this request and delay. Accordingly, Defendant requests an extension of 28 days, up to and including  
12 June 13, 2025, in which to file a Responsive Brief.  
13

14  
15 Dated: May 6, 2025,

Respectfully submitted,

16 JASON M. FRIERSON  
17 United States Attorney

18 /s/ Oscar Gonzalez de Llano  
19 Oscar Gonzalez de Llano  
Special Assistant United States Attorney

20  
21  
22 IT IS SO ORDERED:

23 Brenda Weksler  
24 U.S. MAGISTRATE JUDGE Brenda Weksler

25 DATED: 5/7/2025  
26

**CERTIFICATE OF SERVICE**

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, MD 21235. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO PLAINTIFF'S BRIEF; [PROPOSED] ORDER** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Erika Bailey Drake, Esq.  
Nevada State Bar No. 16786C  
NEVADA LEGAL SERVICES  
701 E. Bridger Ave., Ste. 400  
Las Vegas, NV 89101  
(702)386-0404 ext. 160  
edrake@nevadalegalservices.org

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 6, 2025,

/s/ Oscar Gonzalez de Llano  
Oscar Gonzalez de Llano  
Special Assistant United States Attorney